

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of

Review of the Commission's
Broadcast and Cable
Equal Employment Opportunity
Rules and Policies

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MM Docket No. 98-204

To: The Commission

**COMMENTS OF
AMERICAN WOMEN IN RADIO AND TELEVISION**

AMERICAN WOMEN IN RADIO AND TELEVISION, INC. ("AWRT") hereby submits comments in response to the Second Notice of Proposed Rulemaking (the "NPRM"), FCC 01-363, released December 21, 2001, in the above-captioned proceeding.

AWRT supports the proposals in the NPRM, but submits that the Commission has not gone far enough to ensure equality of employment opportunity for classes (particularly women and minorities) that have historically been and continue to be, under-represented in terms of employment in and ownership of media properties. AWRT believes that the goals underlying this proceeding are best achieved by requiring broadcasters and cable operators to advertise all full-time and part-time job vacancies widely, by imposing reasonable record-keeping and reporting obligations, and by requiring participation in supplemental outreach activities and initiatives that go beyond merely maintaining a mailing list of referral sources and sending vacancy notices. AWRT believes that broadcasters and cable operators should retain discretion in determining the combination of recruitment activities that best serves their respective needs in their respective markets, in view of their respective resources. Broadcasters and cable operators

should be encouraged to utilize evolving technologies, particularly the Internet, as a means of furthering recruitment efforts, but should not rely entirely upon any one media or recruitment source that may not be readily available to some segments of the workforce. Likewise, broadcasters and cable operators should also be encouraged to partner with national and local trade associations and other media organizations that are both industry and female/minority specific, such as AWRT, Women in Cable Telecommunications, National Association of Broadcasters, State Broadcaster Associations, National Association of Hispanic Journalists, National Association of Black Journalists, NAACP, Radio Advertising Bureau, Television Advertising Bureau and the Most Influential Women in Radio (the “MIW Group”), in implementing their EEO programs. Finally, AWRT supports the imposition of reasonable record keeping and regular reporting requirements as a means of making public information on an entity’s recruitment activities.

I INTRODUCTION

AWRT is a national, non-profit organization dedicated to advancing the impact of women in electronic media and allied fields through education, advocacy and serving as a resource for its members and the industry. AWRT members are professional women and men employed in radio, television, cable, advertising and closely allied fields. For more than 50 years since its founding, AWRT’s mission has been to promote the entry and advancement of women in management and ownership of broadcast companies and related businesses. As an integral part of its support of women’s advancement in the broadcasting industry, AWRT has actively participated in numerous Commission proceedings that have addressed ownership and employment issues. Accordingly, AWRT participates in this proceeding because of its critical implications for future employment opportunities for women in the broadcast and cable industry.

AWRT submits that there remains a compelling need for the adoption, implementation and administration of EEO rules. The U.S. Department of Labor's Glass Ceiling Commission Report (published in 1995) reveals that despite an increasingly diverse work force and greater educational opportunities, significant barriers exist to the advancement of women and minorities within the workplace generally and within corporate hierarchies in particular.¹ According to 1990 census data, the U.S. labor force is comprised of 54.3% men and 45.7% women; and 78.8% of the labor force is white and 21.2% is minority.² Employment in the Communications sector at the executive, managerial and administrator level was calculated to be 68.6% male and 30.3% female; and 84% white and 16% minority.³ Although somewhat dated, these statistics demonstrate that women and minorities remain under-represented compared with the labor force generally. As the Glass Ceiling Commission climbed the corporate hierarchy the disparity between white males and the remainder of the talent pool became more pronounced: as of 1995 97% of the senior managers of *Fortune* 1000 Industrial and *Fortune* 500 companies were white, and 95-97% were male.⁴

¹ See, Glass Ceiling Comm'n, U.S. Dep't. of Labor, *A Solid Investment: Making Full Use of the Nation's Human Capital* (1995) ("*Glass Ceiling Report*"), published on-line at http://www.ilr.cornell.edu/library/e_archive/govt_reports/GlassCeiling/documents/GlassCeilingRecommendations.pdf.

² Bureau of the Census, Social and Economic Characteristics, 1990, *referenced in* Glass Ceiling Comm'm, U.S. Dep't of Labor, *Good For Business: Making Full Use of the Nation's Human Capital The Environmental Scan, A Fact-Finding Report* (1995) ("*Fact-Finding Report*") at 21. (Published on-line at http://www.ilr.cornell.edu/library/e_archive/govt_reports/GlassCeiling/documents/GlassCeilingEnvironmentalScan.pdf)

³ *Id.* at 29.

⁴ *Glass Ceiling Report* at 10.

More recent studies conducted by or for Radio Television News Directors' Association-Ball State University⁵, the MIW Group⁶ and the Annenberg Public Policy Center⁷ are also instructive. The 2001 RTNDA Study confirms that women and minorities remain under-represented in broadcast stations and in broadcast newsrooms. According to the RTNDA Study, women comprise 39.7% of the television work force and 37.4% of the radio work force, and minorities represent 24.6% of the television and 10.7% of the radio work force.⁸ The RTNDA Study indicates that women and minorities are significantly under-represented in the managerial position of news directors: only 20.2% of television news directors are reported as females and only 8% are reported as minorities; in radio 21% report female news directors while an abysmal 4.4% report minority news directors.⁹ Again, going up the corporate ladder exaggerates the disparity: 91.3% of television station general managers are white (8.7% minority) and 87.4% are male (12.6% female), while for radio station general managers are 94.3% white (5.7% minority) and 87.7% male (12.3% female).¹⁰

⁵ RTNDA/Ball State University, *2001 Survey of Women and Minorities in Radio and Television News*, published on-line at <http://www.rtna.org.research> (the "RTNDA Study") (copy attached as **Appendix A**).

⁶ MIW Group, Press Release (September 24, 2001) (copy attached as **Appendix B**).

⁷ Annenberg Public Policy Center, *Progress or No Room at the Top? The Role of Women in Telecommunications, Broadcast, Cable and E-Companies* (2001), published on-line at <http://www.appcpenn.org/internet/publicpolicy/progress-report.pdf> (the "Annenberg Study") (copy attached as **Appendix C**).

⁸ Appendix A at 2-4.

⁹ Id.

¹⁰ Id. at 4-5.

Similarly, employment data for radio stations in the top 100 radio markets compiled by M Street Publications for the MIW Group demonstrates that since 1995, women have made only slight improvements in their numbers in managerial positions. In 1995, a meager 8% of all radio station program directors in the top 100 markets were women. That percentage increased only to 10% in 2000 and remained at that level in 2001. Similarly, in 1995, women made up 26% of all sales managers of radio stations in the top 100 markets. By 2000, that percentage increased only to 30% and did not increase in 2001. Women general managers fared only slightly better in terms of increases in numbers. Since 1995 when they made up 11% of all general managers in the top 100 markets, that percentage increased to 13% in 2000 and to 15% in 2001.¹¹

Likewise, the 2001 Annenberg Study reports that only thirteen of the 130 executives (or 10%) at top media and entertainment companies are women,¹² and only thirteen of the 64 executives (or 20%) at network news companies were women.¹³ Of the women in executive positions in these media companies and network news organizations, only *one* has a “clout title”, i.e., a position of the highest power within the organization, such as Chairman, CEO, Vice Chair, President, COO, Senior Executive Vice President and Executive Vice President.¹⁴ At 12%, women account for only a fraction of the board members of media companies.¹⁵

¹¹ See Appendix B at 5.

¹² See Appendix C at 4. Major media/entertainment companies participating in the study include AOL/Time Warner, Clear Channel Communications, General Electric, News Corp, USA Networks, Viacom and Walt Disney Company.

¹³ *Id.* Major news network surveyed includes ABC, CBS, CNBC, CNN and Fox. There was no data available for NBC.

¹⁴ *Id.* at 5.

¹⁵ *Id.* at 6.

As the foregoing data makes abundantly clear, there is a significant, persistent gender and racial disparity in employment in media companies. For that very reason, the Commission should adopt rules governing the EEO responsibilities of broadcasters, cable operators and multichannel video programming distributors (“MVPDs”).

II. THE FCC’S EEO RULES SHOULD FULLY APPLY TO ALL CABLE SYSTEM OPERATORS AND MVPDS CONSISTENT WITH STATUTORY REQUIREMENTS.

To the extent practicable, AWRT believes that the FCC should adopt rules applicable to cable entities, including MVPDs,¹⁶ that are consistent with both the obligations imposed on broadcast licensees, except where necessary to comply with statutory requirements that may only be applicable to cable entities or MVPDs.

III. EMPLOYMENT DISCRIMINATION SHOULD BE PROHIBITED.

AWRT supports the Commission’s re-codification of the prohibition on discrimination on the basis of race, color, religion, national origin or gender. Independent of an express rule on the books, the anti-discrimination provision is an essential component of every licensee’s obligation as a trustee of a valuable public resource. Because the FCC is not empowered to adjudicate individual complaints of employment discrimination, AWRT agrees that the Commission should retain its policy of generally deferring action on applications and in proceedings where such complaints are identified pending their resolution by means of a final decision by either the Equal Employment Opportunity Commission (“EEOC”) or other governmental agencies and/or

¹⁶ “Multichannel video programming distributor” includes cable operators, multipoint distribution service (“MDS”) providers, multichannel multipoint distribution service (“MMDS”) providers, direct broadcast satellite service (“DBS”) providers, television receive-only satellite program distributors, and video

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courts established to enforce non-discrimination laws. Notwithstanding its support of that general policy, AWRT supports the Commission's retention of discretion to take action absent a final decision by the EEOC or other agency/court, where the facts so warrant. Where persuasive evidence demonstrates repeated discrimination problems, whether in the context of a pending application, in a mid-term review or in a random audit of an entity's EEO public file reports, the FCC should take swift and decisive action, including, as appropriate, undertaking an in-depth review of an applicant's qualifications in connection with a pending application or initiating a formal inquiry into the entity's practices. The FCC should impose sanctions where appropriate, including but not limited to, admonishment, forfeitures, and reporting conditions.

IV. BROADCASTERS AND CABLE OPERATORS SHOULD BE REQUIRED TO WIDELY RECRUIT FOR ALL JOB VACANCIES.

As it did in its initial Comments filed in this proceeding¹⁷, AWRT supports EEO rules that focus on both long-term and short-term efforts calculated to reach a diverse applicant pool. And while AWRT's preference would be for a results-oriented standard, i.e., requiring broadcasters and cable operators to demonstrate that their recruitment efforts result in a diverse applicant pool and employment profile, AWRT cannot maintain that position in view of the recent D.C. Court of Appeals ruling that suggests such a results-oriented approach would likely

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dialtone program service providers. 47 C.F.R. Section 76.71(a). As used herein, references to "cable systems", "cable operators" and "cable entities" are intended to encompass MVPDs.

¹⁷ See, *Comments of American Women in Radio & Television, Inc.* filed March 1, 1999.

run afoul of constitutional requirements.¹⁸ AWRT generally supports the Commission's proposed rules, however, with important modifications.

A. Outreach Prong 1 – Recruitment.

1. The Rules Should Require Recruitment Within a Broadcaster's or Cable Entity's Community and Should Encourage Recruitment Beyond the Community.

AWRT supports the Commission's proposal to require that broadcasters and cable entities recruit for all full-time vacancies in a manner reasonably calculated to reach the entire community, with "community" defined as the community, county or Metropolitan Statistical Area ("MSA"), [or Nielsen-defined designated market area ("DMA")] in which a broadcast station is licensed or in which a cable system employees are primarily located. Because geographic mobility is widespread in the broadcast and cable industries, particularly with respect to career advancement, the FCC should encourage recruiting beyond the immediate community. Accordingly, for top-four job categories traditionally reported on the Forms 395-A, 395-B and 395-M, such entities should be required to utilize national or non-community-specific recruitment sources in addition to those within the community.¹⁹ Further, although the Commission does not propose to require the use of recruitment sources that are specifically targeted at minorities and women, AWRT submits that the requirement of "wide dissemination"

¹⁸ *MD/DC/DE Broadcasters Association v. FCC*, 236 F.3d 13, *reh'g denied*, 253 F.3d 732 (D.C. Cir. 2001), *cert. denied subnom.*, *MMTC v. FCC* ___ U.S. ___, 122 S.Ct. 920 (2002)..

¹⁹ Top-four categories include officials and managers, professionals, technicians and sales workers; upper-level job sub-categories include corporate officers, general manager, chief technician, comptroller, general sales manager and production manager. See FCC Forms 395-A, 395-B and 395-M.

of job vacancy information cannot be met without the use of such female- and minority-specific recruitment sources, both on the local and national level.

2. The Rules Should Require Wide Recruitment for All Full-time and All Part-time Vacancies.

The Commission proposes to reinstate its requirement that broadcasters and cable entities widely recruit for all full-time vacancies, and “substantial compliance” with wide recruitment for all part-time vacancies. In AWRP’s view, the loophole allowing for a lesser standard of recruitment for part-time vacancies is unacceptable because it is subject to misinterpretation, misapplication and potential exploitation at the employer level, i.e., the exception that swallows the rule. Moreover, a lesser standard for part-time vacancies is inconsistent with the goals of this proceeding, administratively burdensome, and ultimately will undermine the basis for the requirement.

One goal of this proceeding is to ensure that notices of position vacancies are widely available to all sectors of the labor pool. That goal simply is not served by a rule that allows less than wide dissemination of vacancies for part-time positions. As in any field, a part-time position affords the opportunity to learn important job skills, systems and procedures, and is often a “foot in the door” to additional opportunities within the field. AWRP believes that like full time vacancies, all part-time vacancies should be subject to wide recruitment.²⁰ In addition to advancing the objectives of this proceeding, we believe that such a requirement would not

²⁰ AWRP acknowledges that wide recruitment may not be in limited situations and therefore, does not oppose the Commission’s proposed narrow exception to wide recruitment; i.e., allowing hires without wide recruitment only in instances where an employee leaves without notice and where no other staff member can fulfill those duties.

impose any additional administrative burden on broadcasters and cable operators. In fact, it may simplify the process inasmuch as all vacancies, both full-time and part-time, would be treated in the same manner from an internal administrative perspective.

AWRT also submits that requiring less than wide dissemination for all part-time vacancies will frustrate the objectives of the EEO rules. By the time an employer desires to promote a part-time employee to full-time status it seems likely that the employer has identified its candidate of choice. Under the rule as proposed, if the employer originally recruited widely for the position, it is free to offer that individual a full-time position. If not, not only does the employee have to have records and procedures in place to determine that wide recruitment was not already undertaken, it then must solicit competitive applicants. At best, wide recruitment at this stage is an afterthought, the mechanical implementation of which functions as nothing more than mere formality; at worst, it is a disincentive to potential employees who increasingly view part-time and temporary employment as a viable means of entry into the industry.

For all of these reasons, AWRT supports a requirement that broadcasters and cable entities widely recruit for all full-time and all part-time vacancies. Such a requirement will further the Commission's goals of ensuring wide dissemination of information about job vacancies, will afford greater ease for a station to promote or extend full-time status to already trained part-time employees, will preserve the value of part-time positions as a viable means of gaining meaningful experience in the business, and poses no more administrative burden on broadcasters and cable systems than that of the proposed rule. Recognizing that it often takes significant time to recruit candidates and successfully fill job vacancies, AWRT supports a lesser standard of compliance (specifically, substantial compliance) with respect to temporary employees. AWRT agrees that broadcasters and cable entities should be able to make internal

promotions within an employment unit without conducting wide recruitment. With a wide recruitment standard that applies to both full-time and part-time positions, the employer can be sure that the promotion candidate was initially employed as a result of wide recruitment.

3. Broadcasters and Cable Operators Should be Required to Post All Full-Time and Part-Time Vacancies on Their Respective Websites, but Should Not be Permitted to Rely Solely on Internet Dissemination for Compliance.

AWRT believes that the Internet is a useful recruiting tool, but does not believe that Internet recruitment can be relied upon, by itself in the generic sense, to widely disseminate job vacancy information. To do so would elevate form over function. While ready access to computers and the Internet is undeniably on the rise, AWRT believes that there is and will remain a “digital divide” that should not be leveraged to foreclose employment opportunities to those who may not have ready access to the technology. To do so would place a technology obstacle directly in the path of “wide recruitment” and would limit the applicant pool to those individuals who have knowledge of and ready access to computers and Internet services.

Moreover, some effective recruitment sources, such as AWRT, disseminate job vacancy information through means other than the Internet. AWRT operates a career-line that is publicized on its website and in its member newsletter, but available by fax-on-demand. To allow broadcasters and cable operators to rely solely on Internet dissemination may discourage employers from utilizing AWRT, an effective means of reaching a pool of talented female applicants, and other more traditional sources for job postings, such as local newspapers and other community publications and sources, and industry and trade publications. We also observe

that, although it is not the rule for more general sites,²¹ many special interest association job resources are only available to association members and the public, such as the job sites of National Association of Hispanic Journalists (“NAHJ”)²² and National Association of Black Journalists (“NABJ”)²³. Because the availability of such information on-line through these recruitment sources may be limited, reliance solely on Internet dissemination may not, by virtue of the mode of distribution, meet the wide dissemination requirement. In our view, rather than approving or disapproving any particular mode of dissemination, the rules should mandate the publication of job vacancies on an employer’s own Website as part of its obligation to wide variety of recruitment sources, and should encourage the use of unrestricted Internet sources along with more traditional media. Thus, for the foregoing reasons, the Commission should avoid adopting a rule that would allow potential employers to rely solely on the Internet as a means of disseminating vacancy information.

B. Outreach Prong 2 – Notification to Community Groups.

AWRT supports the Commission’s proposal to require broadcasters and cable entities to providing notification of job vacancies²⁴ to organizations involved in assisting job seekers, upon request by such organizations. However, AWRT would go further and urge that the FCC impose

²¹ An informal and unscientific survey of websites suggests that access to job vacancy postings on such sites are unrestricted. *See, e.g.*, NAB Website at <http://www.nab.org/bcc/program/ViewCurrentPosting.asp>, Comcast Website at <http://www.comcast.com>, Illinois Broadcasters Association Website at <http://www.ilba.org/>, NAACP Website at <http://www.naacpcareerfair.com>.

²² *See* NAHJ Website, JobBank at <http://www.nahj.org/career/jobbank.html>.

²³ *See* NABJ Website, NABJobs at <http://nabj.jobcontrolcenter.com/>. National Association of Minorities in Communication (“NAMIC”), on the other hand, imposes no restrictions on access to its job listings. *See* NAMIC Website, Job Bank at http://www.namic.com/jobs_frame.html.

²⁴ Although AWRT supports that the requirement extend to both part-time and full-time vacancies as described in Section IV.A.2 above.

an affirmative obligation on broadcasters and cable entities to publicize the availability of such information and actively solicit requests from recruitment resources to “join the mailing list”. This could be accomplished through a variety of means, including periodic on-air announcements, periodic newspaper advertisements, direct solicitation by telephone, mail or email, or by a permanent solicitation with appropriate email link to the employer on its Website, or by some other reasonable means determined by the employer.

C. Outreach Prong 3 – Menu Options.

AWRT generally supports, with modifications described herein, the Commission’s proposals to require broadcasters and cable entities to engage in a specified number of employment activities or initiatives selected from among a menu of options. In addition to advocating parity in terms of the number of supplemental initiatives required of both broadcasters and cable entities, AWRT believes that the Commission should increase the number of options required in each two-year period as follows: entities (both broadcasters and cable operators) with more than ten full-time employees should perform at least 6 menu options; entities with five to ten full-time employees should perform at least 3 menu options. This slight increase in the number of menu options to perform over the course of 24 months will not impose a significant burden on broadcasters or cable systems, but will result in significantly more outreach and, we hope, job opportunities for well qualified women, than the current proposal. We support the proposed menu of options, and believe that employers should retain discretion to determine which of the required options to implement.

V. BROADCASTERS AND CABLE OPERATORS SHOULD BE SUBJECT TO RECORDKEEPING AND REPORTING REQUIREMENTS THAT WILL FACILITATE THE MEANINGFUL EVALUATION OF AND PUBLIC COMMENT ON THEIR RECRUITMENT EFFORTS.

A. Record-keeping Requirements.

AWRT agrees with the Commission's statement that the justification for requiring documentation of an entity's efforts is self evident,²⁵ and fully supports the Commission's proposal to require retention of records documenting the employment unit's recruiting efforts and its compliance with the supplemental recruitment measures. We also urge the Commission to require employers to track the recruitment and referral sources of interviewees and hires because it seems to be the most effective means of evaluating whether an entity is achieving the wide dissemination objectives of the rules.

B. Reporting and Enforcement Requirements.

1. EEO Public File Report.

AWRT supports the Commission's re-adoption of reporting requirements that include the preparation and public filing/posting of an annual EEO public file report (which must be placed in local public inspection files and on the broadcasters' and cable entities' web sites). AWRT agrees with the components of such EEO public file reports as described in the NPRM,²⁶ and supports the inclusion of recruitment sources of interviewees and hires in such reports. We agree that preparation and retention of the EEO public file report is not unduly burdensome. On the contrary, the administrative burdens of compiling, preparing and retaining such reports is minimal compared to the importance of the goals underlying the rules. The EEO public file

²⁵ NPRM ¶32.

²⁶ NPRM ¶36. The EEO public file report would include: (a) all full-time jobs filled during the previous year; (b) recruitment sources used to fill those vacancies; (c) address, contact person and telephone number of each recruitment source; and (d) a description of any supplemental initiatives implemented during the previous year.

report is the only meaningful source of public information about a station's employment opportunities and recruitment activities, and therefore, such requirement should be adopted.

2. Mid-Term Reports.

AWRT supports the Commission's revisions to its FCC reporting requirements, but believes that broadcasters and cable entities should file with the FCC their EEO public file reports more frequently than once every four years. AWRT believes that an annual or biennial report (on a schedule consistent with that of the ownership report) is more appropriate, and AWRT supports revision of FCC Form 397 to the extent it facilitates a certification of compliance with EEO rules and the annual or biennial FCC filing. AWRT believes that an annual or biennial filing requirement should apply to all broadcast and cable entities except for those that are exempt under the small employment unit exemptions. Alternatively, if the FCC determines that annual or biennial EEO filings with the FCC would be unduly burdensome, AWRT proposes that the single mid-term Form 397 filing require copies of all EEO public file reports during the license term to date (and not just the year immediately preceding the filing). AWRT supports the FCC's review of the Mid-Term Reports and the attached EEO public file report as part of its mid-term review, but believes that the FCC should have a more complete picture of an entity's employment activities than the year preceding the filing. AWRT also supports random audits to ensure compliance with the rules. AWRT supports all of the changes proposed by the Commission with respect to cable system reporting and FCC filing requirements.

3. Other FCC Forms.

AWRT supports the FCC's retention and continued use of FCC Forms 396 (EEO Program Report to be filed with broadcast renewal applications) and FCC Form 396-A (Model

EEO Program Report to be filed by applicants for new broadcast stations or assignment/transfer of existing stations), as revised to eliminate references to Option A and Option B. AWRT believes these filings are still necessary and useful in providing both the FCC and the general public vital information about a licensee's recruitment activities and a proposed licensee's intended recruitment activities. The FCC should continue evaluating information provided in an entity's EEO filings when reviewing license renewal, transfer and assignment applications.

4. Annual Employment Reports (FCC Forms 395-A, 395-B and 395-M).

AWRT supports the retention of the annual employment report filing on the appropriate FCC form (i.e., Form 395-A, 395-B or 395-M, as applicable to the particular entity). Although AWRT supports the public availability of such reports (either through the FCC or at an entity's public inspection file), we recognize the constitutional problems associated with such a requirement.²⁷ Nonetheless, we believe that it important to collect, compile and study aggregate employment data collected by the FCC. Accordingly, while we support the Commission's collection of employment data for the purpose of compiling such data and reporting to Congress, AWRT urges the Commission to make this data publicly available for evaluation. Accurate employment data on minorities and women can demonstrate where progress is and is not being made. For that reason AWRT urges that the FCC continue its collection of employment profile information on an annual basis, consistent with prior practice (particularly with regard to job classifications and "upper" and "lower", full-time and part-time job categories). AWRT also

²⁷ See, *Lutheran Church-Missouri Synod v. FCC*, 141 F.3d 344 (D.C. Cir. 1998), *reh'g denied*, 154 F.3d 487, *reh'g en banc denied*, 154 F.3d 494 (D.C. Cir. 1998) ("*Lutheran Church*"). In *Lutheran Church* the Court focused on the FCC's processing guidelines as applied to the employment profile reported in stations' annual employment reports, and found that the use of a processing guideline "induces an employer to hire

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urges that the FCC compile, analyze and publish such data, without divulging the specific source of any data or otherwise identifying any filer in a variety of forms. We would like access to and opportunity to review annual employment information broken out by race, gender, job category, by upper level composites, and by full-time and part-time status. The aggregate data should be publicly released by the FCC and posted on the Commission's website.

AWRT does not propose any changes in the filing forms, but is opposed to allowing entities to file anonymously. Because the proposed rule does not contemplate release or publication of any entity-specific data, anonymous filings are unnecessary. Further, we believe that allowing anonymous filings would encourage non-compliance with the rule and thereby result in incomplete industry data. Accordingly, AWRT urges the Commission not to permit such anonymous filings.

C. Small Employment Unit Relief.

AWRT opposes any expansion of the current exemption for small employment units, which exempts from EEO outreach (but not non-discrimination) rules, broadcasters with fewer than five full-time employees and cable entities with fewer than six full-time employees. Because small stations and cable entities provide important entry-level employment opportunities, AWRT believes that no such entity should be exempt from either aspect of the EEO rules. However, in view of the more limited resources of such smaller entities and the administrative burdens inherent in complying with the EEO outreach provisions, AWRT

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with an eye toward meeting the numeric target" thereby implicating the equal protection clause. 141 F.3d at 351-354.

recognizes that a narrow exemption for small employment units may be appropriate, provided that it is narrowly crafted in a manner that curbs potential abuse.

AWRT believes that the exemption should not be available to duopolies or stations involved in local marketing agreements, or to stations and cable systems that are owned or controlled by, or under common control with a group owner in the same or different markets.²⁸ Presumably, such an entity has access to greater resources offered by its ultimate parent or affiliated company and can readily participate in established outreach and supplemental initiatives of its parent and/or affiliate.

In particular, local duopolies that might otherwise independently qualify for the exemption should be considered a single employment unit for purposes of applying the outreach and supplemental initiative requirements under the rules. In our view it would violate the spirit of the EEO rule to excuse each of a number of commonly owned entities from compliance where the number of employees in the aggregate exceeds the small employment unit exemption threshold. Similarly, the exemption should not be available to any employment unit that shifts employees to an entity unregulated by the FCC, whether such entity is independently or commonly-owned by the licensed entity. For example, a broadcaster should not be able to avoid application of the EEO rules by virtue of entering into a management or a local marketing agreement pursuant to which another entity (possibly a non-FCC license holder) assumes responsibility for providing station employees. For these reasons, AWRT supports the

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The indicia for determining whether such ownership or control exists should be consistent with those established in the FCC's ownership rules.

narrowing of the small employment unit exemption, and urges adoption of rules that curb potential for abuse and require compliance with both the spirit and the letter of the rules.

VI. CONCLUSION

For all of the foregoing reasons, AWRT requests that the FCC adopt the proposals in the NPRM, subject to the modifications advocated herein.

Respectfully submitted,

AMERICAN WOMEN IN RADIO AND
TELEVISION, INC.

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APPENDIX A to AWRT COMMENTS

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2001 RTNDA/Ball State University Survey of Women & Minorities in Radio & Television News

The latest figures from the RTNDA/Ball State University survey show a mixed picture for both women and minorities.

Minorities now hold almost a quarter of all jobs in television news, the highest level ever. Even without Spanish-language stations, the 21.8 percent minority work force is still the highest ever recorded. Hispanics and Asian Americans rose from last year and have been generally rising over the last seven years. In contrast, African Americans and Native Americans are largely unchanged. In radio, the percentage of staffs with minorities and the percentage of the minority work force both rose from last year.

The percentage of women in television was virtually unchanged at about 40 percent. The percentage of women in radio news again rose to its highest level ever: 37.4 percent, up from last year's record 35 percent, and well up from the 25.8 percent of the radio work force seven years ago.

While the overall work force numbers generally look good, the news director figures moderate the story. In television, minority news directors lost all of the gains reflected in last year's numbers, sliding back to about the same level as two years ago. There's no way to know whether last year's increase was simply an anomaly-reflecting an unusually high rate of return from stations with minority news directors-or just reflects the high turnover and movement of news directors. In radio, the percentage of minority news directors dropped again, from last year's 6 percent to this year's 4.4 percent. Over the last seven years, the percentage of minority TV news directors has remained unchanged while radio is down.

The percentage of female TV news directors dropped from last year's all-time high of 24 percent, but the more significant figure may be the progress in where those women news directors work. For the first time, women are no more likely to be news directors in smaller markets or smaller stations than in major markets and the biggest news operations. Over the years, women have made steady progress in that area. In radio, women news directors rose from last year's 20 percent to 21.9 percent, but that's still below most of the 1990s, when the figure was in the middle-20s.

BROADCAST NEWS WORK FORCE

Television

	2001	2000	1994
Caucasian	75.4%	79%	82.9%
African	9.9%	11%	10.1%
Hispanic	10.1%	7%	4.2%
Asian American	4.1%	3%	2.2%
Native American	0.6%	<1%	0.6%

Radio

	2001	2000	1994
Caucasian	89.3%	90%	85.3%
African	5.2%	5%	5.7%

Asian American	<1%	1%	0.6%
Native American	<1%	1%	1%

Minorities now hold 24.6 percent of all jobs in television news-the highest level ever. Even without Spanish-language stations, the 21.8 percent minority work force is still the highest ever recorded.

BROADCAST NEWS DIRECTORS

Television

	2001	2000	1994
Caucasian	92.0%	86%	92.1%
African	0.6%	3%	1.6%
Hispanic	5.7%	9%	3.8%
Asian American	1.1%	2%	1.5%
Native American	0.6%	<1%	1%

Radio

	2001	2000	1994
Caucasian	95.6%	94%	91.4%
African	1.5%	3%	5.4%
Hispanic	2.9%	2%	2.4%
Asian American	<1%	0	0
Native American	<1%	1%	0.8%

In television, minority news directors lost the gains reflected in last year's numbers, sliding back to about the same level as two years ago. That might mean last year's increase was an anomaly, or it may reflect the high turnover among news directors (whose median tenure on the job remains at two years). The current figures clearly understate the number of African American news directors, since 0.6 percent would translate to just five African American news directors, and there are considerably more than that. Among English-only television stations, 5.3 percent of the news directors are minorities. In radio, the percentage of minority news directors dropped again, to 4.4 percent.

WOMEN IN BROADCAST NEWS

Television

	News Staffs With Women	Women News Directors	Women as Percentage of Work Force	Average Number of Women on Staff
All Television	97.0%	20.2%	39.7%	13.8
Network Affiliates	98.6%	20.3%	39.8%	14.8
Independents	91.7%	28.6%	36.5%	11.3
DMA 1-25	100%	23.3%	38.6%	27.5

DMA 26-50	100%	23.1%	42.7%	20.2
DMA 51-100	98.0%	11.8%	39.3%	14.4
DMA 101-150	97.7%	23.9%	39.3%	10.3
DMA 151+	93.1%	20.0%	42.0%	7.4
Staff 51+	100%	23.7%	39.2%	30.0
Staff 31-50	98.1%	16.7%	39.2%	14.6
Staff 21-30	87.2%	17.5%	40.6%	10.0
Staff 11-20	92.3%	25.9%	42.5%	6.1
Staff 1-10	80.0%	18.8%	42.5%	2.1

The percentage of women in television remains at about 40 percent, an all-time high. The percentage of women news directors dropped from last year's all-time high of 24 percent, but more are in larger markets and at network affiliates than ever before. In 1994, women made up 36 percent of the television work force and 13.6 percent of TV news directors.

Radio

	News Staffs With Women	Women News Directors	Women as Percentage of Work Force	Average Number of Women on Staff
All Radio	46.4%	21.9%	37.4%	1.3
Major Market****	61.9%	35.3%	41.2%	3.0
Large Market***	36.4%	7.1%	30.8%	0.7
Medium Market**	44.7%	23.3%	31.6%	0.8
Small Market*	42.9%	30.8%	42.9%	0.9

The percentage of women in radio news again rose to its highest level ever-37.4 percent-up from last year's record 35 percent. Women news directors rose from last year's 20 percent to this year's 21.9 percent, but that's still below most of the 1990s when the figure was in the middle-20s. In 1994, women made up 25.8 percent of the radio work force and 22.8 percent of radio news directors.

****more than 1 million listeners ***250,000 to 1 million listeners **50,000 to 249,999 listeners *fewer than 50,000 listeners

MINORITIES IN BROADCAST NEWS

Television

	News Staffs With Minorities	Minority News Directors	Minorities as Percentage of Work Force	Average Number of Minorities on Staff
All Television	86.0%	8.0%	24.6%	8.6
Network Affiliates	87.9%	5.3%	21.3%	7.9
Independents	93.3%	35.7%	67.0%	20.7

DMA 26-50	81.8%	8.3%	18.1%	8.5
DMA 51-100	96.1%	7.8%	24.0%	8.8
DMA 101-150	81.8%	4.5%	15.3%	4.0
DMA 151+	72.4%	3.3%	15.7%	2.8
Staff 51+	100%	10.5%	29.0%	22.2
Staff 31-50	94.4%	9.6%	22.3%	8.3
Staff 21-30	97.4%	5.0%	20.3%	5.0
Staff 11-20	76.9%	11.1%	23.0%	3.3
Staff 1-10	40.0%	0	13.7%	0.7

In television, the minority work force rose to an all-time high of 24.6 percent, up from 21 percent last year. The percentage of minority news directors fell from 14 percent to 8 percent. The drops came in several places, but particularly among the smallest stations and Fox affiliates. Excluding Spanish-language stations, minorities account for 21.8 percent of the television work force and 5.3 percent of television news directors.

Radio

	News Staffs With Minorities	Minority News Directors	Minority as Percentage of Work Force	Average Number of Minorities on Staff
All Radio	15.5%	4.4%	10.7%	0.5
Major Market	42.9%	5.9%	23.4%	1.9
Large Market	12.7%	0	8.1%	0.3
Medium Market	13.2%	7.1%	8.4%	0.2
Small Market	6.1%	0	6.6%	0.1

In radio, the percentage of staffs with minorities rose from 11 percent to 15.5 percent. Likewise, the percentage of minorities in the work force both rose, from 10 percent to 10.7 percent. The percentage of minority news directors dropped from 6 percent to 4.4 percent.

GENERAL MANAGERS

Television

	Percent Caucasian	Percent Minority	Percent Men	Percent Women
All Television	91.3%	8.7%	87.4%	12.6%
Network Affiliates	94.5%	5.5%	87.2%	12.8%
Independents	66.7%	33.3%	93.3%	6.7%
DMA 1-25	83.3%	16.7%	86.7%	13.3%
DMA 26-50	75.0%	25.0%	66.7%	33.3%
DMA 51-100	92.0%	8.0%	90.2%	9.8%

DMA 101-150	97.7%	2.3%	84.0%	16.0%
DMA 151+	93.4%	6.6%	93.3%	6.7%

The white, male world of TV general managers is actually a bit more white and a bit more male this year than last. Last year, 10 percent of TV general managers were minorities and 14 percent were women. Among non-Spanish stations, the percentage of minority general managers dropped to 6.6 percent.

Radio

	Percent	Percent	Percent	Percent
All Radio	94.3%	5.7%	87.7%	12.3%

In radio, the percentage of minority general managers rose marginally from 5 percent to 5.7 percent. The percentage of women general managers remained essentially the same at 12.3 percent.

NEWSPAPER VS. BROADCAST NEWSROOMS

	Daily Newspapers	TV Newsrooms	English-Language TV Newsrooms
Minorities in the Newsroom	11.64%	24.6%	21.8%
African Americans	5.23%	9.9%	10.2%
Hispanics	3.66%	10.1%	6.7%
Asian Americans	2.30%	4.1%	4.2%
Native Americans	0.44%	0.6%	0.6%
Women in the Newsroom	37.35%	39.7%	

Source: American Society of Newspaper Editors, RTNDA/Ball State University survey. All other charts: RTNDA/Ball State University survey.

The survey of newspaper newsrooms shows a slight decrease from last year in minorities, from 11.85 to 11.64 percent, and a slight increase in women, from 37.12 to 37.35 percent. RTNDA's survey of broadcast newsrooms shows an increase in minorities, from 21 to 24.6 percent, and a slight decline in women, from 40 to 39.7 percent. (Note that numbers do not add up exactly because of rounding.)

[Click here for 2000 Women & Minorities Survey results](#)

About the Survey

The RTNDA/Ball State University survey was conducted in the fourth quarter of 2000 among all 1,387 operating, non-satellite television stations and a random sample of 1,193 radio stations. Valid responses came from 731 television stations (52.7 percent) and 120 radio news directors and general managers representing 278 radio stations.

APPENDIX B to AWRT COMMENTS

P R E S S

R E L E A S E

FOR IMMEDIATE RELEASE

For more information contact:

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VIA-EMAIL—6 PAGES

2001 GENDER ANALYSIS SUMMARY SHOWS ONLY SLIGHT IMPROVEMENT FOR WOMEN IN RADIO

Princeton, NJ...September 24, 2001—The Most Influential Women in Radio group (MIW's) has released the 2001 Gender Analysis Summary showing that opportunities for women as general managers at radio stations in the top 100 markets increased only slightly over the past year. The MIW annual gender composition analysis is based on June 2001 information provided to them by M Street publications. Women now manage 15% of all stations in the top 100 markets, compared to 13% last year, announced Joan E. Gerberding, President of Nassau Broadcasting's Nassau Media Partners division and spokesperson for the MIW group. There has been no change in the percentages of stations with female Sales Managers (30%) or Program Directors (10%).

"We are encouraged by the improvement in the number of stations with female General Managers since the first study was released last year," says Gerberding, "But considering that more than half of radio salespeople and nearly a third of radio sales managers are women, the fact that only 15% of the stations are managed by women confirms there is still a glass ceiling in radio. And we continue to be extremely concerned that there is so little opportunity for women in programming."

The 2001 M Street data show that, with some notable exceptions, the more stations a

-- more --

group owns in the top 100 markets, the higher the percentage of women General Managers.

Women comprise 21% of GMs in the eleven groups with 30 or more stations, compared to 18% of GMs in the thirty-nine groups with 12 or more stations, and 15% for all 3211 stations in the top 100 markets. However, groups with 30 or more stations currently have fewer female Sales Managers (30%) and Program Directors (8%) than all groups with 12 or more stations (31% and 9%, respectively).

Among the seven largest groups (50 or more stations in the top 100 markets), the M Street data show that ABC, Cox, and Cumulus have the highest ratio of women as General Managers: 38%, 27% and 26% respectively, while Salem, Clear Channel and Infinity have the lowest, at 7%, 13%, and 15% respectively. For all groups with 12 or more stations the average is 18%.

ABC, Cox and Entercom have the highest percentage of women as Sales Managers, with 43%, 41% and 35% respectively, while the lowest percentages are turned in by Salem (12%), Infinity (23%) and Cumulus (24%). These compare to an average of 31% for all groups with 12 or more stations.

"We applaud ABC, Cox, Cumulus and Entercom," said Gerberding. "These groups clearly recognize the leadership women bring to the roles of General Manager and Sales Manager—their numbers show they are serious about helping women reach parity in these upper management roles. "

"However," Gerberding continued, "opportunities for women as programmers in these seven large companies are less laudable." Entercom is the only group with a double digit percentage (17%) of female Program Directors. Clear Channel and Infinity are tied at 9%, and Cumulus is third at 8%. The groups with the fewest female PDs are Salem at only 2%, ABC at 6% and Cox at 7%.

"One of the most discouraging facts revealed by the data this year," said Gerberding, "is that 14 (44%) of the thirty-two groups that own between 12 and 49 stations in the top 100 markets have *no* female General Managers at all; one (3%) has *no* female Sales Manager; and six (19%) have *no* women as PDs. These companies should have heard [business guru] Tom Peters at the recent NAB Radio show," Gerberding continued, "when he said 'it is my fact based conviction that women's increasing power and leadership skills...is the strongest and most dynamic force at work in the American economy today.' If that doesn't make our industry take note of these inequities, nothing will."

The summary data for all groups with 12 or more stations reflects no duplication in job classification. Individuals with responsibilities for more than one station were only counted once in each category.

The MIW group of top level radio women across the country, who joined forces shortly after they were named to the initial 1999 list, have dedicated themselves to using their influence and resources to help put more women in positions of leadership in radio.

"The MIW's are not just advocating that radio companies improve the number of women in management positions," said Gerberding. "We're *actively* networking, meeting with major

broadcasting company and industry association heads, moderating and staffing panels at broadcasting conventions, sitting on the boards of industry associations and volunteering our time and expertise to help bring a whole different set of leadership qualities to the business of radio.”

Contact information for each MIW and a downloadable version of the MIW Corporate Mentoring Program are available on the www.RadioMIW.com website.

#

MANAGEMENT GENDER 2001 - CONCLUSIONS

Mstreet data June 2001

Top 100 markets

- * Numbers show some improvement for women in management since 1995, and since last year for general managers

Total number of stations managed by women

All stations in top 100 markets

	<u>1995</u>	<u>2000</u>	<u>2001</u>
GMs	11%	13%	15%
SMs	26%	30%	30%
PDs	8%	10%	10%

- * The bigger the group, the better the ratio of women in management, except for PDs (unduplicated numbers)

2001	<u>All stations</u>	<u>Groups 12+</u>	<u>Groups 30+</u>
GMs	15%	18%	21%
SMs	29%	31%	30%
PDs	10%	9%	8%

Group Performance--Groups with 50 or more stations

	Stations	Women GM			Women SM			Women PD		
		#	%	Avg stn.	#	%	Avg stn.	#	%	Avg stn.
Clear Channel	477	17	13%	3.6	90	33%	1.7	33	9%	1.2
Infinity	181	14	15%	2.1	35	23%	1.2	14	9%	1.2
Cumulus	119	6	26%	5.3	12	24%	2.7	6	8%	1.5
Entercom	89	5	21%	2.6	18	35%	1.9	10	17%	2.0
Cox	73	7	27%	2.7	20	41%	1.5	4	7%	1.5
Salem	72	2	7%	3.0	4	12%	1.3	1	2%	1.0
ABC	52	13	38%	1.7	16	43%	1.1	2	6%	1.0
Total	1063									

Best Performing Groups with 50+ stations for women in management

	<u>#1</u>	<u>#2</u>	<u>#3</u>
GM	ABC--38%	Cox--27%	Cumulus--26%
SM	ABC--43%	Cox--41%	Entercom--35%
PD	Entercom--17%	CC & Inf--9%	Cumulus--8%

Worst Performing Groups with 50+ stations for women in management

	<u>#1</u>	<u>#2</u>	<u>#3</u>
GM	Salem--7%	Clear Channel--13%	Infinity--15%
SM	Salem--12%	Infinity--23%	Cumulus--24%
PD	Salem--2%	ABC--6%	Cox--7%

Groups of 12+ with no women in management

	<u>Total</u>	<u>GM</u>	<u>SM</u>	<u>PD</u>
	<u>Stations</u>	<u>Male Managers</u>	<u>Male Managers</u>	<u>Male Managers</u>
Barnstable	17	5		
Big City	13	4	6	
Blue Chip	15	4		
Crawford	28	10		
Greater Media	14	4		
Inner City	12	5		
Jefferson Pilot	17	6		
Journal	27	7		
Lotus	18	6		14
New Wave	12	4		
Pamal	14	5		13
Regent	14	4		
Saga	20	6		18
Simmons	13	3		
Buckley	12			9
Mega	19			10
Radio Unica	11			4

APPENDIX C TO AWRT COMMENTS

Progress or No Room at the Top?

The Role of Women in Telecommunications, Broadcast, Cable and E-Companies

Data for this project compiled by Lorie Slass, Annenberg Public Policy Center
with research assistance from Nicole Porter, Annenberg Public Policy Center

Kathleen Hall Jamieson directed this research. Jamieson is Professor of Communication and Dean of the Annenberg School for Communication, and Director of the Annenberg Public Policy Center of the University of Pennsylvania.

EXECUTIVE SUMMARY

As we enter the 21st century, it is astounding how few women are at the helm of top communications and media firms. These somber statistics present an invaluable opportunity for companies and trade associations to reflect and reward practices designed to attract and retain talented female executives.

**Susan Ness, Commissioner,
Federal Communications
Commission**

- The world of broadcasting and communications is changing rapidly. Television, film, music, radio and publishing companies are being absorbed into ever larger corporations, while telecommunications and e-companies are becoming a prime source for information and commerce all over the world. Yet, as these changes in technology and ownership heighten competition among broadcasting and telecommunications companies, it seems they may be overlooking one major resource – women.
- Even the newest media conglomerates and high tech companies may reflect old attitudes in their executive suites. Women are rarely represented among top executives and boards of directors of media, telecommunications and e-companies, even as these same companies compete fiercely for viewers and users at home and at work.
- Women make up only 13% of the top executives of media, telecom and e-companies and only 9% of their boards of directors. And these figures could actually overstate women's participation in top-level decision-making -- of all the executives included in this analysis, only 3% were women with 'Clout Titles.' (See page 5 for a description of 'Clout Titles.')
- Company executives who are seeking to expand audience share are missing an opportunity to double the real life experiences and communication skills of women in corporate leadership.

SUMMARY TABLES

Where Are the Women in Telecommunications, Broadcast Media and E-Companies?

EXECUTIVES	Executives Who Are Women	Total Executives	Percent Executives Who Are Women
Network News	13	64	20%
Media Companies	13	130	10%
Telecom & Cable Companies	28	291	10%
E-Companies	43	272	16%
TOTAL	97	757	13%

WOMEN WITH CLOUT TITLES	Total Executives	Executives With 'Clout Titles' Who Are Women	Percent of All Executives With 'Clout Titles' Who Are Women
Network News	64	0	0%
Media Companies	130	1	1%
Telecom & Cable Companies	291	8	3%
E-Companies	272	11	4%
TOTAL	757	20	3%

BOARD MEMBERS	Board Members Who Are Women	Total Board Members	Percent Board Members Who Are Women
Media Companies	13	113	12%
Telecom & Cable Companies	23	214	11%
E-Companies	6	147	4%
TOTAL	42	474	9%

ANALYSIS

Broadcast Media & Entertainment Companies – Who Is Making the Decisions in Media Companies Today?

Media companies bring information and entertainment into the home and change the perspectives and lives of the viewer or user. They shape the world. The perspective of women at the decision-making level and as leaders of the strategic direction of these companies is critical to their bottom line performance, as women are often their largest target market.

Dianne Blackwood, WICT
Past National President

The Annenberg Public Policy Center analyzed lists of top executives and board members of media/entertainment companies included in the *Fortune* 1000 top revenue earning companies in the US for 1999. So that all major networks would be represented, General Electric, a diversified company and owner of NBC, and News Corp., a non-US company that owns Fox News, were included in the analysis. See page 15 for a complete description of the methodology.

Only 13 of the 130 named executives in the media/entertainment companies (10%) were women (Table 1). The Center also analyzed the corporate leadership for the network news companies. Only 20% of the top executives at the major news networks (ABC News, CBS News, CNBC, CNN and Fox News) were women (Table 2).

Table 1

MAJOR MEDIA/ENTERTAINMENT COMPANY ¹ EXECUTIVES			
Company	Executives Who Are Women	Total Executives Reported ²	Percent Women
AOL/Time Warner	0	20	0%
Clear Channel Communications ³	5	20	25%
General Electric	2	20	10%
News Corp	1	18	6%
USA Networks	1	20	5%
Viacom ⁴	2	12	17%
Walt Disney Company	2	20	10%
TOTAL	13	130	10%

Table 2

NETWORK NEWS EXECUTIVES			
Company [†]	Executives Who Are Women	Total Executives Reported ⁵	Percent Women
ABC NEWS	1	7	14%
CBS NEWS	3	12	25%
CNBC NEWS	2	15	13%
CNN	5	22	23%
FOX NEWS	2	8	25%
TOTAL	13	64	20%

[†]Executive information for NBC News was not available.

However, titles in and of themselves may not accurately reflect a person's role in the company. While we do not wish to underplay the accomplishments of these women, questions remain: do these women hold real power within their companies? Are these women executives overseeing a variety of departments or are they in positions traditionally held by women, such as public relations, marketing and human resources?

In order to get a sense of the level of power these women hold, we reviewed the list of women executives to determine who held 'Clout Titles.' Catalyst, a non-profit research and advisory organization working to advance women in business identified 'Clout Titles'. 'Clout Titles' include Chairman, Chief Executive Officer, Vice Chairman, President, Chief Operating Officer, Senior Executive Vice President and Executive Vice-President. Executives with these titles have the highest level of power within an organization.

As a CEO for over 16 years at three different entertainment companies, I am both hopeful, yet concerned, about the inability of women and minorities to hold the highest positions in business. I am hopeful because of the expanding number of women in top management positions, as they prove essential in building strong companies. But I am concerned because there are almost no women holding CEO jobs and top board of director positions.

**Margaret Loesch, CEO,
Odyssey Holdings**

Table 3

'CLOUT TITLES' OF EXECUTIVES IN THE MAJOR ENTERTAINMENT/ MEDIA COMPANIES WHO ARE WOMEN		
Title	Number	Percent of All Media Executives
Chairman	0	0%
CEO	0	0%
Vice Chairman	0	0%
President	0	0%
Chief Operating Officer	0	0%
Senior Executive Vice President	0	0%
Executive Vice President	1	1%
TOTAL	1	1%

Table 4

'CLOUT TITLES' OF EXECUTIVES IN NETWORK NEWS COMPANIES WHO ARE WOMEN		
Title	Number	Percent of All Network News Executives
Chairman	0	0%
CEO	0	0%
Vice Chairman	0	0%
President	0	0%
Chief Operating Officer	0	0%
Senior Executive Vice President	0	0%
Executive Vice President	0	0%
TOTAL	0	0%

There was just one woman with a 'Clout Title' among major media/entertainment companies (less than 1% of all the media entertainment executives) (Table 3) and not even one in network news companies (Table 4).

While the media industry doesn't have a strong history of training and mentoring women and minorities, we are slowly waking up to the fact that our future depends on it.

**Jeff Smulyan,
Chairman & CEO,
Emmis Communications**

When the data is examined to determine if these women executives are in departments traditionally populated by women, we found that around half of the female executives (46% in the media/entertainment companies and 38% of the female news executives) work in communications/marketing/PR, human resources or government relations. (Tables 5 and 6).

Table 5

DEPARTMENTS IN MAJOR ENTERTAINMENT/MEDIA COMPANIES IN WHICH EXECUTIVES WHO ARE WOMEN WORKED		
Department	Number	Percent
Communications/Marketing/PR	4	31%
Human Resources	1	8%
Government Relations	1	8%
TOTAL	6	46%

Table 6

DEPARTMENTS IN NETWORK NEWS IN WHICH EXECUTIVES WHO ARE WOMEN WORKED		
Department	Number	Percent
Communications/Marketing/ PR	3	23%
Human Resources	3	23%
TOTAL	5*	38%

*One executive was corporate vice president for human resources and public relations and is represented in both categories. The total reflects the total number of executives and does not double count the executive that was both in PR and HR.

Women account for only a fraction of the board members of these companies as well: just 12% of the board members of the media/entertainment companies are women (Table 7).

Table 7

BOARD OF DIRECTORS OF MAJOR ENTERTAINMENT/MEDIA COMPANIES 2000-2001			
Company	Board Members Who Are Women	Total Board Members	Percent Board Members Who Are Women
AOL Time Warner ⁶	1	16	6%
Clear Channel Communications ⁷	0	13	0%
General Electric ⁸	4	19	21%
News Corp. ⁹	0	15	0%
USA Network ¹⁰	2	13	15%
Viacom ¹¹	2	18	11%
Walt Disney Company ¹²	4	19	21%
TOTALS	13	113	12%

One of the best ways for women to penetrate the corporate mystique is to serve on corporate boards and become actively involved in the inner workings of other corporations.

**Debra Lee, President/COO,
BET Holdings, Inc.**

NEW COMPANIES, OLD ATTITUDES – TELECOMMUNICATIONS, CABLE & INTERNET COMPANIES

Women like doing business with like-minded companies and this "affinity" element is a critical one to understand in rationalizing more women at the senior level. Women value relationships with corporations and products that demonstrate support of women's initiatives and concerns.

**Kay Koplovitz, CEO, Women Working Network;
Chair, National Women's Business Council**

As global communication changes, telecommunication, cable TV and Internet companies have stepped forward with new structures and technologies to communicate news and information around the world. Do women find it easier to reach leadership positions in these companies - or do old habits persist, even in the new economy?

The Annenberg Public Policy Center analyzed the top executives and board members for those companies among the top 1000 revenue earners identified by *Fortune* as telecommunications. Even in newer companies, women make up a small percentage of top executives and board members.

Table 8

MAJOR TELECOM & CABLE COMPANIES ¹³ EXECUTIVES			
Company	Executives Who Are Women	Total Executives Reported ¹⁴	Percent Executives Who Are Women
ALLTEL	0	13	0%
AT&T ¹⁵	2	20	10%
Bell South	2	20	10%
Cablevision	3	15	20%
Century Tel	1	16	6%
Citizens Communication ¹⁶	0	20	0%
Comcast	3	20	15%
Cox Communications	3	20	15%
Echostar	1	10	10%
Nextel	1	20	5%
NTL	0	9	0%
Qwest ¹⁷	0	20	0%
SBC Communications	6	19	32%
Sprint	2	20	10%
Telephone and Data Systems	1	20	5%
Verizon ¹⁸	3	19	16%
Worldcom ¹⁹	0	10	0%
TOTAL	28	291	10%

Only one in ten (10%) of the telecom and cable executives is a woman (Table 8), and just eight of the 27 hold 'Clout Titles' (only 3% of all the telecom executives included in the analysis) (Table 9). In addition, half of executives in these companies (50%) who are women work in public relations, marketing or human resources (Table 10).

Table 9

CLOUT TITLES ²⁰ OF WOMEN EXECUTIVES IN THE MAJOR TELECOMMUNICATION & CABLE COMPANIES		
Title	Number	Percent of All Telecom Execs
Chairman	0	0%
Chief Executive Officer	0	0%
Vice Chairman	0	0%
President	0	0%
Chief Operating Officer	0	0%
Senior Executive Vice President	3	1%
Executive Vice President	5	2%
TOTAL	8	3%

Of the 214 members of boards of directors on the 17 telecommunications companies included in the *Fortune* 1000, only 23, or about one in ten, are women (Table 11).

Table 10

DEPARTMENTS WOMEN TELECOM & CABLE EXECUTIVES WORKED IN		
Department	Number	Percent
Communications/Marketing/ PR	9	32%
Human Resources	5	18%
TOTAL	14	50%

Reasonable progress has been made for women in the middle ranks of telecom management. It is at the senior levels, at the CEO level especially, and at the board level, however, that great needs still persist.

Leo Hindery, Chairman, HL Capital, Inc.

Table 11

BOARD OF DIRECTORS OF TELECOMMUNICATIONS COMPANIES			
Company	Women Board Members	Total Board Members	Percent Women Board Members
ALLTEL ²⁰	1	14	7%
AT&T ²¹	1	14	7%
Bell South ²²	2	13	15%
Cablevision ²³	1	14	7%
Century Tel ²⁴	1	14	7%
Citizens Communication ²⁵	1	13	8%
Comcast ²⁶	1	9	11%
Cox Communications ²⁷	1	7	14%
Echostar ²⁸	0	5	0%
Nextel ²⁹	1	10	10%
NTL ³⁰	0	13	0%
QWest ³¹	2	14	14%
SBC ³²	6	21	29%
Sprint ³³	1	10	10%
Telephone and Data Systems, Inc ³⁴	2	13	15%
Verizon ³⁵	1	16	6%
Worldcom ³⁶	1	14	7%
TOTAL	23	214	11%

For analysis of the e-company executives, researchers used *Fortune* Magazine's list of top e-companies. According to *Fortune* "these companies are redefining not only the way business is done but also how we shop, communicate, advertise, entertain ourselves, plan our lives, and manage our finances³⁷."

Although women appear to have equal representation in the trenches of the communications industry, it is alarming that only a select few have been placed in positions of true power and influence.

**Maggie Wilderotter,
President & CEO,
Wink Communications**

Table 12

MAJOR E-COMPANY ³⁸ EXECUTIVES			
Company	Executives Who Are Women	Total Executives Reported ³⁹	Percent of Executives Who Are Women
Amazon.com	0	10	0%
Ameritrade	2	9	22%
AOL/Time Warner	0	20	0%
Charles Schwab	6	20	30%
CMGI	3	20	15%
CNET	3	14	21%
Doubledclick	3	20	15%
E*Trade	5	17	29%
EBay	3	11	27%
Freemarkets.com	1	12	8%
Healthon/WebMD	3	14	21%
Homestore.com	1	12	8%
Infospace	1	12	8%
Knight Trading Group	0	16	0%
Openwave (phone.com)	0	7	0%
RealNetworks	3	20	15%
Vertical Net	1	20	5%
Yahoo	8	18	44%
TOTAL	43	272	16%

Only 16% of the executives in the largest e-companies were women (Table 12) and 35% of the executives worked in communications/ marketing/PR or human resources (Table 13). Eleven of the female executives in the e-companies held 'Clout Titles' (accounting for only 4% of all e-company executives) (Table 14). Notably, one e-company, eBay, has a female President and CEO, Margaret Whitman. Whitman was the only female CEO among the 757 executives included in this analysis.

Table 13

E-COMPANY DEPARTMENTS IN WHICH EXECUTIVES WHO ARE WOMEN WORKED		
Department	Number	Percent
Communications/Marketing/PR	7	16%
Human Resources	8	19%
TOTAL	15	35%

When people talk about the qualities of leadership that will win out in the 21st Century, they use female words – intuitive, collaborative, inclusive – it's a world filled with webs and networks, not hierarchies, warfare, command and control.

**Gerry Laybourne,
President & CEO, Oxygen Media**

Table 14

CLOUT TITLES* OF EXECUTIVES IN THE MAJOR E-COMPANIES WHO ARE WOMEN		
Title	Number of Women	Percent of All E-Company Execs*
Chairman	0	0%
Chief Executive Officer	1	.4%
Vice Chairman	2	1%
President	4	0%
Chief Operating Officer	0	0%
Senior Executive Vice President	0	0%
Executive Vice President	4	2%
TOTAL	11	4%

*Execs with more than one 'Clout Title' were only counted once (for example if someone was President & CEO they were only counted in the CEO category).

While there are a small number of women in the executive suites of these e-companies, even fewer occupy the boardrooms. Fewer than one in twenty board members (4%) of the major *Fortune* e-companies are women (Table 15).

Table 15

BOARD OF DIRECTORS OF THE MAJOR E-COMPANIES			
Company	Board Members Who Are Women	Total Board Members	Percent Board Members Who Are Women
Amazon ⁴⁰	1	5	20%
Ameritrade ⁴¹	0	9	0%
AOL/Time Warner ⁴²	1	16	6%
Charles Schwab ⁴³	1	13	8%
CMGI ⁴⁴	0	6	0%
Dobleclick ⁴⁵	0	8	0%
E*Trade ⁴⁶	0	9	0%
eBay ⁴⁷	2	7	29%
Freemarkets.com ⁴⁸	1	8	13%
Healthon/WebMd ⁴⁹	0	12	0%
Homestore ⁵⁰	0	7	0%
Infospace ⁵¹	0	8	0%
Knight Trading Group ⁵²	0	14	0%
Openwave.com ⁵³	0	6	0%
Real Networks ⁵⁴	0	5	0%
Vertical.net ⁵⁵	0	7	0%
Yahoo ⁵⁶	0	7	0%
TOTAL	6	147	4%

ON THE AIR, BUT NOT IN CONTROL

With the emergence of interactive services in the broadband communications industry, it is critical for women not only to participate in this technology development, but to help guide and lead it.

Yvette Gordon, Vice President, Interactive Technologies, Seachange International, Inc.

While the number of women who are anchors or in prominent on air positions in local TV and radio news has increased, women account for less than one in four news directors nationwide, and an even smaller proportion of general managers (17% in television and 13% in radio.). And the newest industry, cable television, has the lowest percentage of women represented, with women accounting for only 4% of systems managers (Table 16).

The numbers are somewhat better at national and network news, but the pattern is inconsistent: women comprise almost half (44%) of network and national cable anchors, but they are only 19% and 38%, respectively, of radio and television network bureau chiefs in the Bacon's Media Database.

Table 16

WOMEN IN BROADCASTING -- RADIO AND TELEVISION ON-AIR, EDITORIAL AND PUBLIC AFFAIRS ¹			
Title	Total	Women	Percent Who Are Women
TV Anchors (Local)	2474	1276	52%
TV Promotions Managers/Directors	409	187	46%
TV Anchors (National)	70	31	44%
Radio Promotions Managers	2158	924	43%
Network Bureau Chiefs (TV)	72	27	38%
Executive Producer TV	608	222	37%
Radio Ad Sales Managers	2511	933	37%
Television Ad Sales Managers	1064	331	31%
Radio News Directors	2383	672	28%
TV News Directors	765	200	26%
Network Bureau Chief (Radio)	27	5	19%
Television General Managers	1003	170	17%
Meteorologists	1259	177	14%
Radio General Managers	4873	640	13%
Cable Systems Managers	570	20	4%
TV Sports Anchors	520	19	4%

¹Contacts with that title from Bacon's Media Database, contacts that held the same title for multiple stations were only listed once.

The Public Face of the Media Industry: Who Communicates for the Communicators?

Many trade associations represent the interest of media and telecommunications companies, as listed in the *Associations Yellow Book, Winter 2001*, published by Leadership Directories, Inc. The Yellow Book includes the presidents and boards of directors of these associations, together with their annual budgets.

The lack of women at board level in US media and telecommunications companies is significant; but it's an even greater issue internationally. I represent Liberty Media on boards in the UK, Japan, Ireland, France, Spain; and in none of the companies is there another woman at the board or executive director level.

Miranda Curtis, President, Liberty Media International

Of 40 different trade associations representing the range of media and telecommunications companies, women account for 17% and 12%, respectively, of the boards of directors. Six of the 27 media trade associations (22%) have women who are presidents, compared to just 1 of the 13 telecommunications associations (Tables 17 & 18).

Table 17

Media Trade Associations ^{5b}	President Who Is A Woman	Board Members Who Are Women	Total Board Members	Percent of Board Who Are Women
Academy of Television Arts & Sciences	N	2	6	33%
American Business Media	N	2	22	9%
American Society of Newspaper Editors	N	6	20	30%
Association of American Publishers, Inc.	Y	2	20	10%
Association of Imaging Technology and Sound	N	1	14	7%
Association of Local Television Stations, Inc.	N	0	19	0%
BPA International	N	5	29	17%
Cable & Telecommunications Association for Marketing	Y	9	25	36%
Cable Television Laboratories, Inc.	N	0	4	0%
Magazine Publishers of America, Inc.	Y	9	43	21%
National Association of Broadcasters	N	9	61	15%
National Association of State Radio Networks, Inc.	Y	1	6	17%
National Association of Television Program Executives	N	9	22	41%
National Cable Television Association	N	0	31	0%
National Cable Television Cooperative, Inc.	N	3	12	25%
National Newspaper Association	Y	1	19	5%
Newspaper Association of America	N	0	5	0%
PROMAX	N	6	22	27%
Radio Advertising Bureau, Inc.	N	0	51	0%
Radio-Television News Directors Association	Y	8	26	31%
Regional Reporters Association	N	8	13	62%
Satellite Broadcasting and Communications Association of America	N	6	35	17%
Society of Motion Picture and Television Engineers	N	1	41	2%
Society of Professional Journalists	N	4	23	17%
Television Bureau of Advertising, Inc.	N	5	35	14%
The Association of America's Public Television Stations	N	6	19	32%
The National Academy of Television Arts and Sciences	N	7	29	24%
TOTAL	6	110	652	17%

Table 18

Telecommunications Trade Associations ^{5b}	President Who Is A Woman	Board Members Who Are Women	Total Board Members	Percent of Board Who Are Women
Alliance for Telecommunications Industry Solutions	Y	4	33	12%
Building Industry Consulting Services International	N	1	11	9%
Cellular Telecommunications and Internet Association	N	N/A	N/A	N/A
Communications Supply Service Association	N	1	18	6%
Competitive Telecommunications Association	N	3	18	17%
Healthcare Information and Management Systems Society	N	6	12	50%
National Telephone Cooperative Association	N	0	12	0%
Personal Communications Industry Association	N	0	4	0%
Society of Cable Telecommunications Engineers, Inc.	N	1	15	7%
Telecommunications Industry Association	N	3	45	7%
The Organization for the Promotion and Advancement of Small Telecommunications Companies	N	3	21	14%
United States Telecom Association	N	4	45	9%
Wireless Communications Association International	N	0	36	0%
TOTAL	1	32	270	12%

Anecdotal evidence reveals that women are even less likely to be featured prominently at major media and telecommunications industry meetings. Women are rarely superpanel members or keynoters. Recent examples include the National Association of Broadcasters meeting in April, 2000, the annual meeting for the Cellular Telecommunications Association (Wireless 2000), the Competitive Telecommunications Industry Association Annual Convention, February 2000, and Supercomm 2000 in June, co-sponsored by the United States Telecom Association and the Telecommunications Industry Association – none of which had women as featured speakers. There were just two exceptions: the Personal Communications Industry Association in September 2000 had one woman among its major speakers, as did the Wireless Communications Association meeting in July 2000

Where women are included they are more likely to be moderators than presenters: For example, at the National Cable Television Association Meeting in May 2000, all three women among the 27 speakers were moderators. And while the Association of Local Television Stations (ALTV) Annual Meeting, in January of 2000, had thirty major speakers in the program, just two – a panelist and a moderator – were women.

One of our biggest priorities is to create a workforce that is as diverse as our customer base. It is the right thing to do. It is also the right thing to do for our business. We will make better decisions and be more successful if the people who develop, market and service our products match our customers.
Steve Burke, President, Comcast Cable Communications, Inc.

CONCLUSION & RECOMMENDATIONS

Being the first woman to break through a glass ceiling anywhere means special pressures and responsibilities, and among them is the opportunity to ensure that the next CEO, the next board member, the next panelist, is also a woman. That means being sure that when we get to the top, we drop down the ladder for those who come behind...and we share with them the knowledge, experience they will need to take each step.

Pat Michell, President, PBS

As telecommunications, cable and e-commerce and media industries face the challenges of a rapidly changing economy, they don't seem to be forward looking in developing their strategies for leadership. Communications companies are innovating in technology, ways of sending and receiving information, and economic models for the 21st century – but their executive suites and boardrooms still largely resemble the stereotyped practices of the 1950's. Women represent a larger and larger share of the target users and audiences these companies are trying to reach, but women's talents and life experiences are still underrepresented by company decision-makers. The time has come for future-oriented companies to add new talent and leadership as they adjust their product lines and services to address the requirements of the new economy and new century.

We urge communications companies and their trade associations to determine whether more can be done within their own institutions to include women at the highest levels.

Based on discussions with prominent industry executives, we have compiled a list of concrete steps that can be taken to achieve the goal of advancing more women to the top levels in these industries as well as and increasing realistic opportunities for entrepreneurial women to own telecommunications and media outlets.

Finding the right executives to lead top companies is a difficult task even under ideal conditions. Reducing that available talent pool 50% by categorically precluding women from these positions makes it a virtual certainty that many of these companies are not being led by the best talent. It greatly reduces the level of competition and hurts the entire industry.

**Ann Carlsen, Founder & CEO,
Carlsen Resources, Inc.**

Advancing Women to Top Level Positions

- **Mentoring** – Women at the top have few mentors or colleagues with whom to consult. Such feedback can play a vital role in success. Mentoring opportunities with both senior executive women and men provide valuable assistance and should be encouraged.
- **Executive Recruitment** – Executive recruiters should be encouraged to identify qualified women for senior and top level jobs when searches are undertaken. Executive search firms can distinguish themselves in the marketplace by establishing lists of accomplished women in these fields.

The problem is most probably not the result of malice or deliberate exclusion, but rather, due to maintaining comfort levels of high ranking executives – males feeling most comfortable with other males. It is up to the corporate world to establish an atmosphere where male and female executives can learn to feel comfortable working together, appreciating the contribution that such diversity brings to the table.

**Jill A. Slavin, President,
FastForward Communications**

- Training – Trade associations and companies should identify successful training programs, both in and outside the industry, that could be used to train more women for top level positions, or to develop such programs where none now exist. Associations should become a resource for such information.
- Internal Audit – Companies and trade associations should do a thorough internal examination to determine whether they encourage or discourage women from advancing within their institutions and whether their corporate culture encourages retention of such executives. Are there women who today are qualified to move into positions of greater responsibility and authority? Are there programs in place to train executives, and have women been encouraged to participate in such programs? Have efforts been undertaken to ensure that women are made aware when top level openings occur?
- Industry Associations – Trade associations should examine their convention and conference programming to ensure that executive women are featured on super-panels and as keynoters. Such recognition will help companies to identify talented women for other positions.

Placing More Women on Boards

- Working with Executive Recruiters – Companies filling board positions should work with executive recruiters with a demonstrated record of success in identifying qualified women for placement.
- Mentoring – Women and men should be identified who already are serving on boards of directors of communications companies and who are willing to mentor women seeking similar board opportunities.

Different voices in the boardroom give a company not just diversity, but depth.

**Anne Sweeney, President,
ABC Cable Networks Group;
President, Disney Channel
Worldwide**

Ownership

- Identifying Sources of Capital – A resource list should be developed of general sources of capital as well as of funds earmarked for women.
- Reinstatement of the Tax Certificate – Support is needed for legislation that would create a viable tax certificate program that includes women.
- Training – Training opportunities should be identified – or created – that would give entrepreneurial women vital information and contacts.
- Mentoring – Female and male owners willing to serve as mentors for entrepreneurial women should be identified and matched with those interested in ownership opportunities.

METHODOLOGY

Executives

News Companies

For each of the news companies, researchers conducted a Lexis-Nexis search of the 2001 Directory of Corporate Affiliations. Since Fox News was not included in the Directory, executive information was gathered from their website (<http://www.newscorp.com/management/foxnews.html> [Viewed, February 2001]). While the Directory of Corporate Affiliations lists top executives, it may not be an exhaustive list and some key executives may be left out.

Media, Telecommunication and E-Companies

Data for executives were gathered in a Lexis-Nexis search of the Hoover's Profiles of Companies, 2001. Hoover Profiles include a listing of key officers for companies. This information is gathered from company sources such as the annual report and press releases, from official filings such as the 10-K and proxy statements, and from outside sources such as newspapers, trade journals, and other articles in the press. Hoover's updates these lists on a daily basis throughout the year using press releases or other notifications in the press (see http://www.hoovers.com/hoov/join/sample_officers.html). While this list is thorough, and includes the most senior executives, it may not be exhaustive and some executives could be excluded. The Hoovers data was taken from the 2001 Hoovers Directory. The executive list for Homestore.com was taken from <http://ir.stockmaster.com/ir/HOMS/officers.html>, viewed February 2001.

Boards of Directors

Data for boards of directors were taken from annual reports, the company's website, e-mail responses from the companies or from company descriptions in Yahoo Finance.

On-Air, Editorial and Public Affairs

Bacon's Media Database of media contacts was searched for specific titles and positions and entries were sorted by gender.

Trade Association Data

All trade association data were obtained from the *Associations Yellow Book Winter 2001*.

ENDNOTES

- ¹From *Fortune* list of top Entertainment companies, <http://www.fortune.com/fortune/fortune500/ind145.html> (Viewed, February 2001 and General Electric which owns NBC and News Corp. which owns Fox. Some of the companies on the list have been acquired by other companies; those acquisitions are cited in the endnotes section.
- ²Hoover's Company Profile Database, 2001
- ³Acquired AMFM and SFX in 2000.
- ⁴Acquired CBS, Inc. in 2000.
- ⁵From Directory of Corporate Affiliations, 2001 for all companies except Fox News which was taken from <http://www.newscorp.com/management/foxnews.html> (Viewed, February 2001)
- ⁶www.timewarner.com/about/whos_who/board/index.html (Viewed, February 2001)
- ⁷Acquired AMFM and SFX in 2000; Board information from an Email from Randy Palmer VP/Investor Relations
- ⁸http://www.ge.com/news/exec_office/board.htm (Viewed, February 2001)
- ⁹<http://www.newscorp.com/management/board.html> (Viewed, February 2001)
- ¹⁰<http://yahoo.marketguide.com/mgi/biograph.asp?rt=biograph&rn=A11A0> (Viewed, February 2001)
- ¹¹Viacom acquired CBS, Inc. in 2000, board information from US Business Directory, February 1, 2001
- ¹²2000 Annual Report
- ¹³From the *Fortune* list of top telecommunications companies, <http://www.fortune.com/fortune/fortune500/ind157.html> (Viewed, February 2001). Some of the companies on the list have been acquired by other companies; those acquisitions are cited in the endnotes section.
- ¹⁴Hoover's Company Profile Database, 2001
- ¹⁵Acquired Media One in 2000
- ¹⁶Formerly Citizens Utilities
- ¹⁷Acquired US West in 2000
- ¹⁸Acquired Bell Atlantic & GTE in 2000
- ¹⁹Acquired MCI in 2000
- ²⁰<http://www.alltel.com/investors-index.html> (Viewed February 2001)
- ²¹Acquired Media One group in 2000, http://www.att.com/leadership/leadership_a.html (Viewed, February 2001)
- ²²<http://bellsouthcorp.policy.net/whoweare/board.vtml> (Viewed, February 2001)
- ²³<http://www.cablevision.com/company/index.html> (Viewed, February 2001)
- ²⁴<http://yahoo.marketguide.com/mgi/offdirs.asp?rt=offdirs&rn=1748N> (Viewed, February 2001)
- ²⁵<http://yahoo.marketguide.com/mgi/offdirs.asp?nss=yahoo&rt=offdirs&rn=18770> (Viewed, February 2001)
- ²⁶http://WWW.COMCAST.COM/defaultframe.asp?section=about_us&SubSection=au-board (Viewed, February 2001)
- ²⁷http://WWW.COX.COM/Corp/Fact%20Sheet.asp#P59_2230 (Viewed, February 2001)
- ²⁸http://www.corporate-ir.net/ireye/ir_site.zhtml?ticker=dish&script=2200 (Viewed, February 2001)
- ²⁹<http://yahoo.marketguide.com/mgi/offdirs.asp?nss=yahoo&rt=offdirs&rn=A02BD> (Viewed, February 2001)
- ³⁰http://www.corporate-ir.net/ireye/ir_site.zhtml?ticker=NLI&script=2200#dir (Viewed, February 2001)
- ³¹Acquired US West in 2000, <http://www.qwest.com/about/company/board/index.html>
- ³²<http://yahoo.marketguide.com/mgi/offdirs.asp?rt=offdirs&rn=8220N> (Viewed, February 2001)
- ³³<http://www3.sprint.com/sprint/ir/sd/bod.html> (Viewed, February 2001)
- ³⁴<http://www.teldta.com/investor/index-frames.html> (Viewed, February 2001)
- ³⁵<http://investor.verizon.com/profile/board.html> (Viewed, February 2001)
- ³⁶<http://yahoo.marketguide.com/mgi/offdirs.asp?rt=offdirs&rn=50715> (Viewed, February 2001)
- ³⁷From *Fortune's* description of the Fortune e-companies, December 1999.
- ³⁸From the *Fortune* list of top e-companies, <http://www.fortune.com/fortune/e50/> (Viewed, February 2001)
- ³⁹Hoover's Company Profile Database, 2001, except for Homestore.com, taken from <http://ir.stockmaster.com/ir/HOMS/officers.html> (Viewed February 2001).
- ⁴⁰<http://www.iredge.com/IREdge/IREdge.asp?c=002239> (Viewed, February 2001)
- ⁴¹<http://www.amtd.com/investor/2000annual/sharei/> (Viewed, February 2001)
- ⁴²www.timewarner.com/about/whos_who/board/index.html (Viewed, February 2001)
- ⁴³Email from Charles Schwab PR received February 14, 2001
- ⁴⁴http://www.cmgi.com/about/leadership_director.jhtml (Viewed, February 2001)
- ⁴⁵http://ir.doubleclick.net/ireye/ir_site.zhtml?ticker=DCLK&script=2200 (Viewed, February 2001)
- ⁴⁶2000 Annual Report
- ⁴⁷<http://yahoo.marketguide.com/mgi/offdirs.asp?rt=offdirs&rn=A1C7E> (Viewed, February 2001)
- ⁴⁸<http://yahoo.marketguide.com/mgi/offdirs.asp?nss=yahoo&rt=offdirs&rn=A216D> (Viewed, February 2001)

⁴⁹ <http://www.webmd.com/corporate/index.html> (Viewed, February 2001)

⁵⁰ <http://yahoo.marketguide.com/mgi/offdirs.asp?rt=offdirs&rn=A1F92> (Viewed, February 2001)

⁵¹ <http://yahoo.marketguide.com/mgi/offdirs.asp?nss=yahoo&rt=offdirs&rn=A1D4E> (Viewed, February 2001)

⁵² Formerly Knight Trimark, <http://yahoo.marketguide.com/mgi/offdirs.asp?rt=offdirs&rn=A1B47> (Viewed, February 2001)

⁵³ Formerly phone.com, <http://www.openwave.com/about/board.html> (Viewed, February 2001)

⁵⁴ <http://www.freedgar.com/Search/FilingsResults.asp?SourcePage=CompanyList&CIK=1046327&UseFrame=1&FormType=&DateFiled=&CompanyName=REALNETWORKS+INC> (Viewed, February 2001)

⁵⁵ <http://www.verticalnet.com/AboutUs/Board.asp> (Viewed, February 2001)

⁵⁶ http://docs.yahoo.com/info/investor/inv_officers.html (Viewed, February 2001)

⁵⁷ Taken from Bacon's Media Contacts Database, February 2001

⁵⁸ From the *Associations Yellow Book, Winter 2001*

⁵⁹ From the *Associations Yellow Book, Winter 2001*